REMARKS/ARGUMENTS

Subject to the Examiner's entry of the amendments to the claims made herein, claims 1-34 are pending in the application. In the above Office Action the Examiner has rejected claims 1-20 in the manner discussed below. By this Amendment claims 1-4, 6, 8-12, 14, 16-18 and 20 have been amended, and new claims 21-34 have been added, in order to further define the present invention.

In the first rejection made within the above Office Action, the Examiner rejected claims 1-20 under 35 U.S.C. §103(a) as being unpatentable over Applicant's admitted prior art in view of Chaiken et al (U.S. Patent No. 6,116,767). For the reasons discussed below, Applicant respectfully submits that it is inappropriate to combine Chaiken et al with Applicant's admitted prior art and that Chaiken et al fails to describe Applicant's claimed switching means.

With respect to FIG. 1 of the present specification, Applicant has described a conventional handheld computing device 125 connected to a conventional laptop computer 100. Laptop computer 100 includes a microprocessor 102 configured to execute an operating system 116, which enables laptop computer 100 to function in a conventional manner.

Handheld computing device 125 includes a microprocessor 127 designed to execute an operating system 141. During operation, handheld computing device functions in a low power, "instant on" manner, whereby when it is powered-on, microprocessor 127 executes instructions representing operating system 141 and applications 143 directly from main memory and flash memory 131.

Chaiken describes an entirely different type of system from that described by Applicant with reference to FIG. 1. Specifically, Chaiken describes a computer system which supports a secondary operational mode (i.e., an "audio CD mode") in which traditional system BIOS is bypassed. This mode is intended to enable audio CDs to be played in a CD-ROM drive without running an operating system (see, e.g., Chaiken at col. 4, lines 30-35). It follows that Chaiken does not describe a system in which different processors execute different operating systems during operation in instant on and non-instant on modes. Accordingly, any "switching

mechanisms" allegedly described by Chaiken would have no use in the fundamentally different system described by Applicant with respect to FIG. 1.

In contrast to both the system described by Applicant with respect to FIG. 1 of the present specification and Chaiken's system, the present invention describes a system in which a common set of input/output devices are disposed to be used during both instant on and non-instant on operative modes. The instant on mode is affected by a first plurality of electronic components controlled by a first operating system while the non-instant on mode is affected by a second plurality of electronic components controlled by a second operating system. The inventive system further includes one or more switching mechanisms to selectively couple the input/output devices to one or more of the first plurality of electronic components and to selectively couple the input/output devices to one or more of the second plurality of electronic components.

Because Chaiken doesn't utilize a common set of input/output devices in both instant on and non-instant on modes, Chaiken doesn't require the switching mechanisms contemplated by the invention. Instead, Chaiken's system is configured to include a number of dedicated controls available to a user during operation in the audio CD mode. As described by Chaiken, these controls enable playback of audio CDs to be controlled without waiting for execution of the lengthy booting process associated with conventional computer operation:

> A conventional computer system has required a user to access numerous locations, software and hardware, to adjust audio tracks or to adjust the volumes of various audio sources such as a CD, wave, and synthesizer for music listening. These locations typically include a mixer in a Windows CD-ROM drive application for controlling the volume of audio sources and selecting tracks, a software master volume control in a Windows task bar, and a hardware volume thumbwheel. As these volume control sources controlled volume independent of each other, it was necessary for a user to sort through cumbersome CD-ROM drive software to adjust the volume of the appropriate audio sources. In light of the software nature of certain volume controls, it was also necessary to maintain the portable computer case in an open state with the display screen visible to a user to allow for certain volume adjustments during music listening or allow for track changes.
>
> In the present invention, the master volume control buttons 35 allowing for a single source of volume control, which is accessible while the portable computer case C is in a closed state. The master volume control buttons 35 are digital *and are preferably*

> *connected directly* to the audio chip 34. The volume up button and the volume down button of the master volume control buttons 35 *are hardwired inputs* to the audio chip 34. [6:30-53, emphasis added]

Given the *direct* and/or *hardwired* connections between Chaiken's dedicated input elements and CD-mode processing elements, there is no need within the Chaiken system for the selective coupling mechanisms of the invention. Applicant thus respectfully submits that the Examiner has not demonstrated the existence of selective coupling between Chaiken's input devices used in audio CD mode and a different set of electronic components used during Chaiken's primary operative mode.

Similarly, Chaiken's system does not appear to selectively couple the mini LCD screen 55 between a set of electronic components effecting Chaiken's audio CD mode and a different set of components responsible for Chaiken's primary operative mode. Specifically, the mini LCD screen 55 is connected to the mini LCD control circuitry 80, which is in turn connected to keyboard controller 46. Since this connection is maintained during all of Chaiken's operative modes, Applicant respectfully submits that the Examiner has not demonstrated selective coupling of the mini LCD screen 55 to different sets of electronic components during operation of Chaiken's system in different operative modes.

Notwithstanding these differences between the prior art cited by the Examiner and the system of the present invention, in order to advance prosecution of the application the pending claims have been amended to further highlight the distinction between the cited subject matter and the claimed invention. In particular, the pending claims now recite that one of the claimed plurality of input/output devices includes an input device disposed to receive user input processed by a first application program executed during operation in the instant on mode and additional user input processed by a second application program during operation in the non-instant on mode of operation. Support for this amendment is found in the present specification at, for example, page 15 lines 3-12 and page 14 lines 15-23. Applicant respectfully submits that neither Chaiken nor Applicant's alleged admitted prior art describes or suggests use of an input device through which user input is received for processing by first/second application programs in instant on and non-instant on modes.

New claims 21-34 further define the present invention by reciting that at least one of the plurality of input/output devices displays output generated by the first application program during operation in the instant on mode of operation and other output generated as a result of execution of the second application program during operation in the non-instant on mode. Applicant respectfully submits that neither Chaiken nor Applicant's alleged admitted prior art describes or suggests display of output generated by first/second application programs capable of processing user input received during instant on and non-instant on modes of operation.

Applicant respectfully requests entry of the amendments described herein prior to further examination of the above-identified application. The undersigned would of course be available to discuss the present application with the Examiner if, in the opinion of the Examiner, such a discussion could lead to resolution of any outstanding issues.

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Respectfully submitted,
COOLEY GODWARD LLP

By: _____
Kevin J. Zimmer
Reg. No. 36,977

Cooley Godward LLP
ATTN: Patent Group
Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306-2155
Tel: (650) 843-5000
Fax: (650) 857-0663